IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re: Chapter 11

MINING PROJECT WIND DOWN HOLDINGS, INC. (f/k/a Compute North Holdings, Inc.), *et al.*,

Debtors.1

Case No. 22-90273 (MI)

(Jointly Administered)

THE MINING PROJECT WIND DOWN HOLDINGS, INC. LITIGATION TRUST AND PLAN ADMINISTRATOR'S WITNESS AND EXHIBIT LIST FOR HEARING ON MAY 15, 2023

The Mining Project Wind Down Holdings, Inc. Litigation Trust and Plan Administrator (the "Plan Administrator and Litigation Trust") respectfully submits this witness and exhibit list (the "List") for the hearing scheduled for May 15, 2023, at 9:00 a.m. (prevailing Central Time) (the "Hearing").

WITNESS LIST

The Plan Administrator and Litigation Trust may call all of the following witnesses at the Hearing:

The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, include: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551); Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The Reorganized Debtors' service address for the purposes of these chapter 11 cases is 2305A Elmen Street, Houston, TX 77019.

- 1. Michael Tribolet;
- 2. Any witnesses called or designated by Atlas Technology Group, LLC ("Atlas"), Harold E. Coulby, Jr. ("Coulby"), BitNile, Inc. ("BitNile"), or any other party; and
- 3. Any witness necessary to rebut testimony of a witness called or designated by the Atlas, Coulby, BitNile or any other party.

EXHIBIT LIST

The Plan Administrator and Litigation Trust may use any of the following exhibits at the Hearing:

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
1.	Proof of Claim No. 10118 filed by Harold E.				
	Coulby, Jr. on November 23, 2022, against Compute North Holdings, Inc.				
2.	Proof of Claim No. 10079 filed by Atlas				
	Technology Group, LLC on November 21, 2022, against Compute North LLC				
3.	Master Agreement between Compute North LLC				
	and Atlas Technology Group LLC dated September 2, 2021				
4.	Any exhibit designated or used by Atlas, Coulby,				
	BitNile or any other party				
5.	Any exhibit necessary to rebut the evidence or				
	testimony of any witness called or designated by				
	Atlas, Coulby, BitNile or any other party				

The Plan Administrator and Litigation Trust reserves the right to amend or supplement this List at any time prior to or during the Hearing.

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Dated: May 11, 2023 Respectfully submitted,

MCDERMOTT WILL & EMERY LLP

/s/ Charles R. Gibbs

Charles R. Gibbs (Texas State Bar No. 7846300)
Debbie E. Green (Texas State Bar No. 24059852)

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-and-

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Counsel to the Mining Project Wind Down Holdings, Inc. Litigation Trust and the Plan Administrator

CERTIFICATE OF SERVICE

I certify that on May 11, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas. I further certify that on May 11, 2023, I caused a true and correct copy of the document to be served by electronic mail and First Class U.S. Mail upon the following party at the addresses indicated herein:

Harold E. Coulby, Jr. 1510 Stablersville Road White Hall, MD 21161 E-mail: barry.coulby@gmail.com

/s/ Charles R. Gibbs
Charles R. Gibbs